

# **EXHIBIT**

# **C**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|   |                                       |
|---|---------------------------------------|
| In re Terrorist Attacks on September 11, 2001   | 03-md-1570 (GBD)(SN)<br><br>ECF Case  |
| This document relates to:<br><br><i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i> | 15-cv-9903 (GBD) (SN)<br><br>ECF Case |

**DECLARATION OF CARMEN BRIDGEFORTH, AS THE PERSONAL  
REPRESENTATIVE OF THE ESTATE OF DAVID ALLEN BRIDGEFORTH**

I, Carmen Bridgeforth, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.
2. I am the surviving spouse of David Allen Bridgeforth, deceased, and Personal Representative of his Estate. He passed away on November 30, 2011, Attached as Exhibit A to this Declaration is a true and correct copy of his death certificate and Estate paperwork.
3. David was a citizen of the United States on September 11, 2001, and remained so until the time of his death. Attached as Exhibit B to this Declaration is a true and correct copy of his proof of citizenship.
4. On September 11, 2001, David was present at the World Trade Center when the terrorist attacks occurred.

5. David was employed by the Port Authority of New York and New Jersey and was working in the cafeteria on the forty-third floor of the North Tower when the passenger jet crashed into the building.

6. David received serious physical injuries during these terrorist attacks. As the first plane hit the North Tower, the impact caused the grill in the kitchen where David was working to become dislodged. The grill fell on top of David, crushing his legs and inflicting severe burns. Once he was able to remove himself from under the weight of the grill, David limped toward the stairwell, where he found my son, Antonio, and I.

7. David and Antonio struggled to find an exit for the three of us, and we had to run back up several stairwells that were engulfed in flames. When we finally came upon a safe stairwell, David had to use his injured body to help force the door open. We ran out of the building as quickly as we could, with David limping the entire way due to his serious injuries. When we exited the building, we learned that my son, Godwin, had escaped safely.

8. Seconds later, the South Tower began to collapse. We tried to run away from the destruction, but David was bombarded with clouds of dust, bricks, steel, and other debris from the collapse.

9. In the course of the attack and our escape, David and I and my son, Antonio, witnessed atrocities beyond the imagination of the average citizen. We saw people jumping from the buildings to their certain deaths and saw their bodies hit the ground. We watched as young firefighters ran toward danger with concern on their faces while civilians ran toward safety. When we found what we believed to be a safe place, we saw first responders lying helplessly on the ground, injured and unable to help those in need, including David. The situation could only be

compared to a war zone. We were going about our everyday lives in a peaceful manner when we were brutally attacked by terrorists and our lives were altered forever.

10. As a result of these terrorist attacks, David suffered the following specific injuries on September 11, 2001: Injuries to his knee, leg, arm, back and 3rd degree burns on both legs. He inhaled harmful fumes, debris, and dust during the course of the attack and his escape.


11. David lost several friends and co-workers because of the terrorist attacks on September 11<sup>th</sup>. David watched as his wife and stepson suffered injuries in front of him, and he was left to wonder whether his other stepson, Godwin, had survived the attack.

12. The traumatic events that David witnessed on 9-11 caused him to suffer from severe anxiety and emotional distress. He suffered, and continued to suffer, severe emotional distress until his death at 49 years of age from congestive heart failure. He suffered and continued to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks until his passing.

13. David sought medical attention for his injuries. He was transported to Brooklyn Hospital immediately following the 9-11 attacks, and he further continued to seek treatment for his numerous injuries and emotional distress until his passing in 2011.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 14 day of January 2020.

  
Signature of Declarant – Carmen Bridgeforth, as  
Personal Representative of the Estate of David Allen  
Bridgeforth

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**